



May 15, 2003

2888 '03 JUN -6 P2:23

Mr. Robert Moore  
 Office of Nutritional Products, Labeling &  
 Dietary Supplements, HFS 811  
 Food and Drug Administration  
 5100 Paint Branch Parkway  
 College Park, MD 20740

RECEIVED  
 MAY 30 2003  
 BY:

RE: Label Claims/Disclaimers

Dear Mr. Moore:

This letter is to notify you that PhytoPharmica at 825 Challenger Drive, (a Division of Integrative Therapeutics, Inc.), Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	End Fatigue™ Daily Energy Enfusion™	Vitamin A, Vitamin C, Vitamin D, Vitamin E, Biotin, Iodine, Magnesium, Zinc, Selenium, Copper, Manganese, Chromium, Molybdenum, Sodium, Potassium, Whey Protein, Malic Acid, Inositol, Inulin, Hesperidin, Taurine, Glycine, L-Tyrosine, N-Acetylcysteine, L-Serine, Boron	Vitamin A (as 50% beta carotene and as retinyl acetate): Beta-carotene is an antioxidant and free radical fighter.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

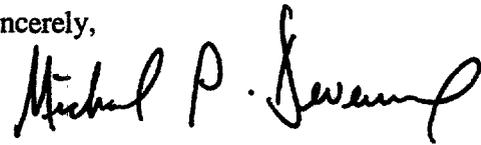
By: Robert C. Doster  
 Robert C. Doster  
 Title: Senior Vice President of Scientific Affairs

Date: 5/15/03

975 0162 LET 12040  
 84572  
 825 CHALLENGER DRIVE  
 GREEN BAY, WI 54311-8328  
 920-469-9099  
 TOLL FREE 800-553-2370  
 FAX 920-469-4418  
 FAX TOLL FREE 888-311-5657  
 WWW.PHYTOPHARMICA.COM

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608

Sincerely,

A handwritten signature in black ink, appearing to read "Michael P. Devereux". The signature is written in a cursive style with a large, prominent initial "M".

Michael P. Devereux  
Chief Financial Officer



May 15, 2003

Mr. Robert Moore  
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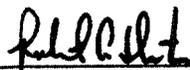
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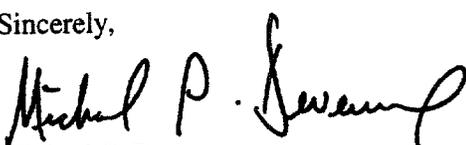
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Date: 5/15/03

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Sincerely,

  
 Michael P. Devereux  
 Chief Financial Officer

End Fatigue Daily Energy Enfusion 33p

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# PhytoPharmica.

NATURAL MEDICINES™

May 16, 2003

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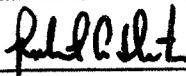
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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: 

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/16/03

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Sincerely,



Michael P. Devereux  
Chief Financial Officer

End Fatigue Daily Energy Enfusion 34p

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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/16/03

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Sincerely,

Michael P. Devereux

Michael P. Devereux  
 Chief Financial Officer

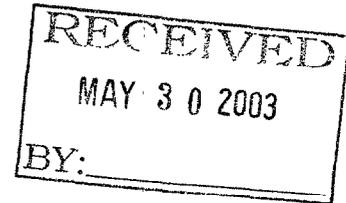
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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster  
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/17/03

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Michael P. Devereux  
Chief Financial Officer



May 17, 2003

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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster  
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 Title: Senior Vice President of Scientific Affairs

Date: 5/17/03

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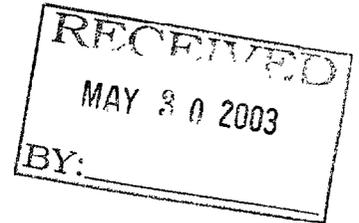
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Michael P. Devereux  
Chief Financial Officer



May 18, 2003

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Office of Nutritional Products, Labeling &  
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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster  
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/18/03

825 CHALLENGER DRIVE  
GREEN BAY, WI 54311-8328  
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Michael P. Devereux  
Chief Financial Officer



May 19, 2003

Mr. Robert Moore  
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By: Robert C. Doster  
Robert C. Doster  
Title: Senior Vice President of Scientific Affairs

Date: 5/19/03

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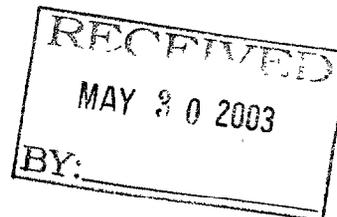
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Michael P. Devereux  
Chief Financial Officer



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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: 

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/19/03

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Michael P. Devereux  
Chief Financial Officer



May 20, 2003

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By: Robert C. Doster  
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 Title: Senior Vice President of Scientific Affairs

Date: 5/20/03

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Michael P. Devereux  
Chief Financial Officer



May 20, 2003

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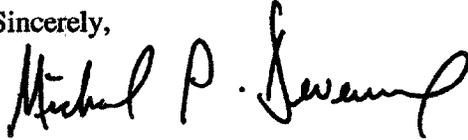
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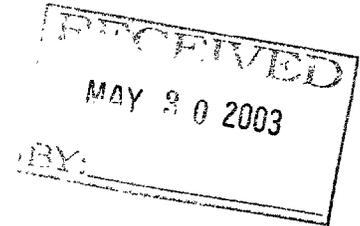
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 College Park, MD 20740



RE: Label Claims/Disclaimers

Dear Mr. Moore:

This letter is to notify you that PhytoPharmica at 825 Challenger Drive, (a Division of Integrative Therapeutics, Inc.), Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	End Fatigue™ Daily Energy Enfusion™	Vitamin A, Vitamin C, Vitamin D, Vitamin E, Biotin, Iodine, Magnesium, Zinc, Selenium, Copper, Manganese, Chromium, Molybdenum, Sodium, Potassium, Whey Protein, Malic Acid, Inositol, Inulin, Hesperidin, Taurine, Glycine, L-Tyrosine, N-Acetylcysteine, L-Serine, Boron	L-Alanine: The building blocks of protein, amino acids are nitrogen-containing organic compounds composing the structure of proteins. They are essential to human metabolism and to making the human body function properly for good health.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster  
 Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/23/03

825 CHALLENGER DRIVE  
 GREEN BAY, WI 54311-8328  
 920-469-9099  
 TOLL FREE 800-553-2370  
 FAX 920-469-4418  
 FAX TOLL FREE 888-311-5657  
 WWW.PHYTOPHARMICA.COM

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608

Sincerely,

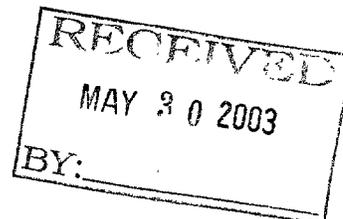
A handwritten signature in black ink that reads "Michael P. Devereux". The signature is written in a cursive style with a large, stylized initial "M".

Michael P. Devereux  
Chief Financial Officer



May 23, 2003

Mr. Robert Moore  
Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 811  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740



RE: Label Claims/Disclaimers

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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

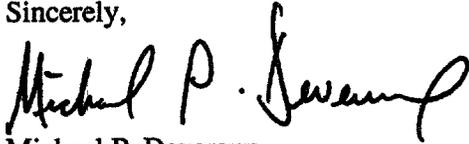
By: Robert C. Doster  
Robert C. Doster  
Title: Senior Vice President of Scientific Affairs

Date: 5/23/03

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Sincerely,

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Michael P. Devereux  
Chief Financial Officer



# PhytoPharmica<sup>®</sup>

NATURAL MEDICINES™

May 24, 2003

Mr. Robert Moore  
 Office of Nutritional Products, Labeling &  
 Dietary Supplements, HFS 811  
 Food and Drug Administration  
 5100 Paint Branch Parkway  
 College Park, MD 20740

RECEIVED  
 MAY 30 2003  
 BY: \_\_\_\_\_

RE: Label Claims/Disclaimers

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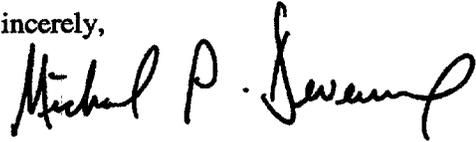
By: Robert C. Doster  
 Robert C. Doster  
 Title: Senior Vice President of Scientific Affairs

Date: 5/24/03

825 CHALLENGER DRIVE  
 GREEN BAY, WI 54311-8328  
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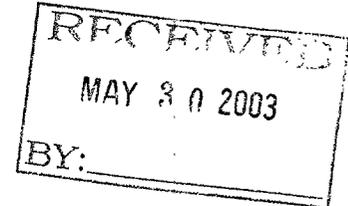
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Michael P. Devereux  
Chief Financial Officer



May 18, 2003

Mr. Robert Moore  
Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 811  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740



RE: Label Claims/Disclaimers

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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

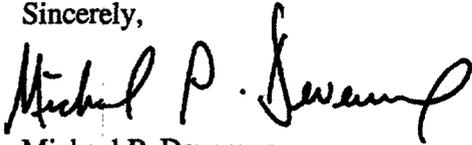
By: Robert C. Doster  
Robert C. Doster  
Title: Senior Vice President of Scientific Affairs

Date: 5/18/03

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Sincerely,

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Michael P. Devereux  
Chief Financial Officer



May 18, 2003

Mr. Robert Moore  
 Office of Nutritional Products, Labeling &  
 Dietary Supplements, HFS 811  
 Food and Drug Administration  
 5100 Paint Branch Parkway  
 College Park, MD 20740

RECEIVED  
 MAY 30 2003  
 BY: \_\_\_\_\_

RE: Label Claims/Disclaimers

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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster  
 Robert C. Doster  
 Title: Senior Vice President of Scientific Affairs

Date: 5/18/03

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Michael P. Devereux  
Chief Financial Officer



# PhytoPharmica<sup>®</sup>

NATURAL MEDICINES™

May 18, 2003

Mr. Robert Moore  
Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 811  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740

RECEIVED  
MAY 30 2003  
BY:

RE: Label Claims/Disclaimers

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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster  
Robert C. Doster  
Title: Senior Vice President of Scientific Affairs

Date: 5/18/03

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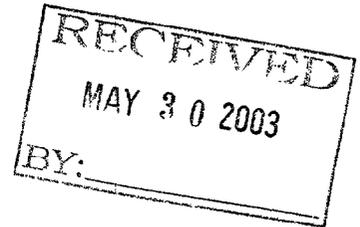
Sincerely,

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Michael P. Devereux  
Chief Financial Officer

May 19, 2003

Mr. Robert Moore  
Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 811  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740



RE: Label Claims/Disclaimers

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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster  
Robert C. Doster  
Title: Senior Vice President of Scientific Affairs

Date: 5/19/03

825 CHALLENGER DRIVE  
GREEN BAY, WI 54311-8328  
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Michael P. Devereux  
Chief Financial Officer



May 19, 2003

Mr. Robert Moore  
 Office of Nutritional Products, Labeling &  
 Dietary Supplements, HFS 811  
 Food and Drug Administration  
 5100 Paint Branch Parkway  
 College Park, MD 20740

RECEIVED  
 MAY 30 2003  
 BY: \_\_\_\_\_

RE: Label Claims/Disclaimers

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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

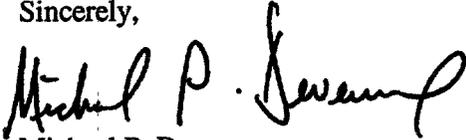
By: Robert C. Doster  
 Robert C. Doster  
 Title: Senior Vice President of Scientific Affairs

Date: 5/19/03

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Michael P. Devereux  
Chief Financial Officer



May 21, 2003

Mr. Robert Moore  
 Office of Nutritional Products, Labeling &  
 Dietary Supplements, HFS 811  
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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster  
 Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/21/03

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Michael P. Devereux  
Chief Financial Officer



RECEIVED  
MAY 30 2003  
BY: \_\_\_\_\_

May 21, 2003

Mr. Robert Moore  
Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 811  
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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster  
Robert C. Doster  
Title: Senior Vice President of Scientific Affairs

Date: 5/21/03

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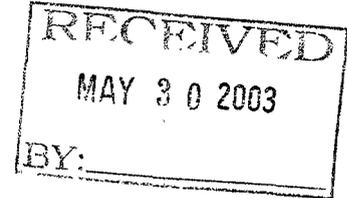
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May 21, 2003

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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster  
Robert C. Doster

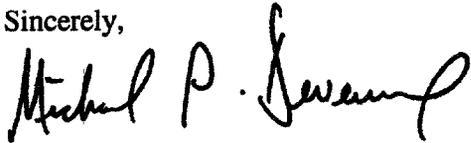
Title: Senior Vice President of Scientific Affairs

Date: 5/21/03

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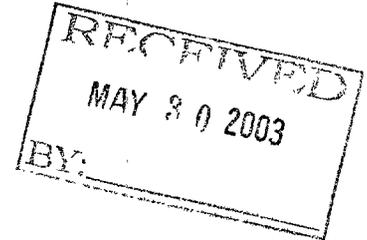
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Michael P. Devereux  
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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/21/03

825 CHALLENGER DRIVE  
GREEN BAY, WI 54311-8328  
920-469-9099  
TOLL FREE 800-553-2370  
FAX 920-469-4418  
FAX TOLL FREE 888-311-5657  
WWW.PHYTOPHARMICA.COM

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608

Sincerely,

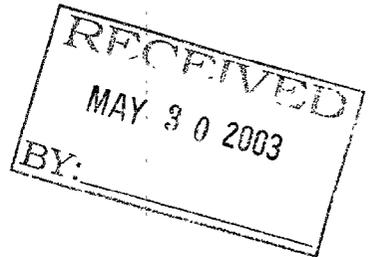


Michael P. Devereux  
Chief Financial Officer



May 22, 2003

Mr. Robert Moore  
Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 811  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740



RE: Label Claims/Disclaimers

Dear Mr. Moore:

This letter is to notify you that PhytoPharmica at 825 Challenger Drive, (a Division of Integrative Therapeutics, Inc.), Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	End Fatigue™ Daily Energy Enfusion™	Vitamin A, Vitamin C, Vitamin D, Vitamin E, Biotin, Iodine, Magnesium, Zinc, Selenium, Copper, Manganese, Chromium, Molybdenum, Sodium, Potassium, Whey Protein, Malic Acid, Inositol, Inulin, Hesperidin, Taurine, Glycine, L-Tyrosine, N-Acetylcysteine, L-Serine, Boron	L-Serine: An amino acid, helps strengthen the immune system; supports synthesis of fatty acid sheath around nerve fibers.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster  
Robert C. Doster  
Title: Senior Vice President of Scientific Affairs

Date: 5/22/03

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608

Sincerely,

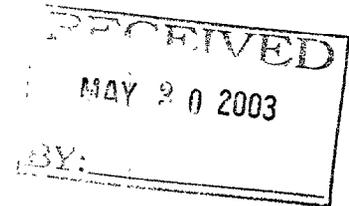
A handwritten signature in black ink, appearing to read "Michael P. Devereux". The signature is written in a cursive style with a large, prominent initial "M".

Michael P. Devereux  
Chief Financial Officer



May 22, 2003

Mr. Robert Moore  
Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 811  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740



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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster  
Robert C. Doster  
Title: Senior Vice President of Scientific Affairs

Date: 5/22/03

825 CHALLENGER DRIVE  
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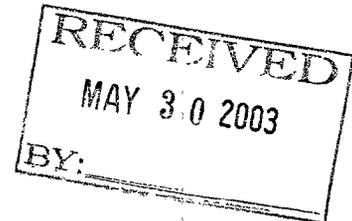
A handwritten signature in black ink that reads "Michael P. Devereux". The signature is written in a cursive style with a large, stylized initial "M".

Michael P. Devereux  
Chief Financial Officer



May 24, 2003

Mr. Robert Moore  
Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 811  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740



RE: Label Claims/Disclaimers

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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/24/03

825 CHALLENGER DRIVE  
GREEN BAY, WI 54311-8328  
920-469-9099  
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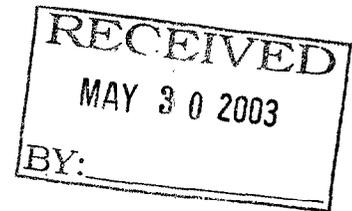
A handwritten signature in black ink that reads "Michael P. Devereux". The signature is written in a cursive style with a large, stylized initial "M".

Michael P. Devereux  
Chief Financial Officer



May 25, 2003

Mr. Robert Moore  
Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 811  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740



RE: Label Claims/Disclaimers

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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster  
Robert C. Doster  
Title: Senior Vice President of Scientific Affairs

Date: 5/25/03

825 CHALLENGER DRIVE  
GREEN BAY, WI 54311-8328  
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Sincerely,

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Michael P. Devereux  
Chief Financial Officer

May 25, 2003

RECEIVED  
 MAY 30 2003  
 BY:

Mr. Robert Moore  
 Office of Nutritional Products, Labeling &  
 Dietary Supplements, HFS 811  
 Food and Drug Administration  
 5100 Paint Branch Parkway  
 College Park, MD 20740

RE: Label Claims/Disclaimers

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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster  
 Robert C. Doster  
 Title: Senior Vice President of Scientific Affairs

Date: 5/25/03

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Sincerely,

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Michael P. Devereux  
Chief Financial Officer



May 26, 2003

Mr. Robert Moore  
 Office of Nutritional Products, Labeling &  
 Dietary Supplements, HFS 811  
 Food and Drug Administration  
 5100 Paint Branch Parkway  
 College Park, MD 20740

RECEIVED  
 MAY 30 2003  
 BY: \_\_\_\_\_

RE: Label Claims/Disclaimers

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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster  
 Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/26/03

825 CHALLENGER DRIVE  
 GREEN BAY, WI 54311-8328  
 920-469-9099  
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Michael P. Devereux  
Chief Financial Officer



May 26, 2003

Mr. Robert Moore  
 Office of Nutritional Products, Labeling &  
 Dietary Supplements, HFS 811  
 Food and Drug Administration  
 5100 Paint Branch Parkway  
 College Park, MD 20740

RECEIVED  
 MAY 30 2003  
 BY:

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By: Robert C. Doster  
 Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/26/03

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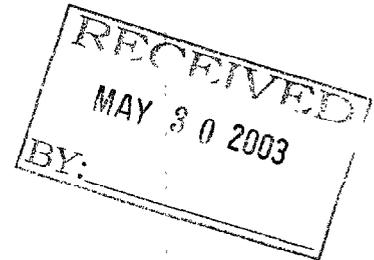
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Michael P. Devereux  
Chief Financial Officer



May 27, 2003

Mr. Robert Moore  
Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 811  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740



RE: Label Claims/Disclaimers

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By: Robert C. Doster  
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Title: Senior Vice President of Scientific Affairs

Date: 5/27/03

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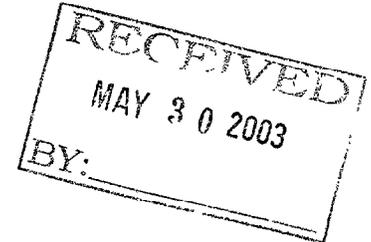
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Chief Financial Officer



May 27, 2003

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By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/27/03

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Michael P. Devereux  
Chief Financial Officer

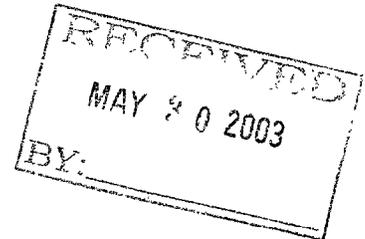


# PhytoPharmica<sup>®</sup>

NATURAL MEDICINES<sup>™</sup>

May 28, 2003

Mr. Robert Moore  
Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 811  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740



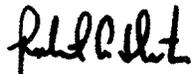
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By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/28/03

825 CHALLENGER DRIVE  
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Michael P. Devereux  
Chief Financial Officer

May 28, 2003

Mr. Robert Moore  
 Office of Nutritional Products, Labeling &  
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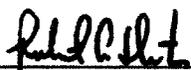
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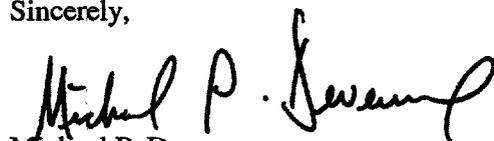
Title: Senior Vice President of Scientific Affairs

Date: 5/28/03

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